

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

Case No: 3:18-cr-00577-CRB-1

Case Name: USAv. Michael Richard Lynch

USA v. Stephen Keith Chamberlain

TRIAL SHEET, EXHIBIT and WITNESS LIST

JUDGE: Charles R. Breyer	PLAINTIFF ATTORNEY: Adam Reeves, Kristina Green, Robert Leach, Zacahry Abrahamson	DEFENSE ATTORNEY: Gary Lincenberg, Michael Landman, Ray Seilie (Chamberlain); Christopher J. Morvillo, Celeste Koeleveld, Brian Heberlig, Reid Weingarten (Lynch)
TRIAL DATE: March 21, 2024	REPORTER(S): Rhonda Aquilina Jennifer Coulthard	CLERK: Lashanda Scott

PLF NO.	DEF NO.	DATE/TIME OFFERED	ID	REC	DESCRIPTION	BY
		9:15 a.m.			Judge cried-in. Court Reporter-Jennifer Coulthard	
		9:15 a.m.			All jurors present. All parties present. Defense (Chamberlain) cross-examination of witness Ganesh Vaidyanathan	
	9667		X	X	Exhibit 9667 marked and admitted	
		9:16 a.m.			Government re-direct of witness Ganesh Vaidyanathan	
630			X	X	Exhibit 630 marked and admitted Portions of Autonomy's website	
291			X	X	Exhibit 291 marked and admitted Q3 2009 Autonomy Corporation plc Earnings Conference Call Transcript and Presentation	
11447			X	X	Exhibit 11447 marked and admitted Presentation. Description: Autonomy Q3 2009 Results Presentation	
3317			X	X	Exhibit 3317 marked and admitted Email from WangR to SullivanM/ DesrochesR/ByronS/TuckerJ/SullivanJ re "Re: Software purchased"	
		9:41 a.m.			Defense (Lynch) re-cross examination of witness Ganesh Vaidyanathan	
	3317		X		Exhibit 3317 previously admitted	
	3318		X		Exhibit 3318 previously admitted	

	11447		X		Exhibit 11447 previously admitted	
	630		X		Exhibit 630 previously admitted	
		9:50 a.m.			Defense (Chamberlain) re-cross examination of witness Ganesh Vaidyanathan	
		9:51 a.m.			Witness excused	
		9:52 a.m.			Government witness sworn John Baiocco	
32			X	X	Exhibit 32 marked and admitted License and Distribution Agreement btwn Capax and Autonomy	
2559			X	X	Exhibit 2559 marked and admitted Zantaz, Inc. Invoices	
100			X	X	Exhibit 100 marked and admitted Autonomy Value Added Reseller Agreement entered into between Autonomy and Capax Discovery LLC. Signed by Andrew Kanter and John Baiocco	
17143			X	X	Exhibit 17143 marked and admitted	
4895			X	X	Exhibit 4895 marked and admitted Purchase Order Exhibit "B" from Autonomy Value Added Reseller Agreement	
388			X	X	Exhibit 388 marked and admitted Letter from Joel Scott to John Baiocco re Revised Payment Arrangement	
439			X	X	Exhibit 439 marked and admitted Email from Parveena Vishwa to Chris Chu attaching invoice re Eli Lilly deal	
		10:28 a.m.			Court in recess	
		10:46 a.m.			Court reconvened. All jurors present. All parties present. Government direct-examination of witness John Baiocco	
633			X	X	Exhibit 633 marked and admitted Email from John Baiocco to Dave Spadone re financial details on Eli Lilly deal	
6150			X	X	Exhibit 6150 marked and admitted Email chain between BaioccoJ, DSpadone@apbuffalo, S Egan re Message; body suggests collection calls	
1102			X	X	Exhibit 1102 marked and admitted Referral agreement for Eli Lilly, wire transfer, and invoice	
2559			X		Exhibit 2559 previously admitted	
2746			X	X	Exhibit 2746 marked and admitted Capax TXU, Q2 2009	
427			X	X	Exhibit 427 marked and admitted First Amendment to License and Distribution Agreement between Autonomy, Inc. and Capax Discovery LLC, dated December 31, 2009	
622			X	X	Exhibit 622 marked and admitted Email from John Baiocco to Andrew Kanter ("promised more than a dollar for dollar on this") attaching Capax Aging Report	
690			X	X	Exhibit 690 marked and admitted Purchase Order from Capax Discovery, LLC	

726			X	X	Exhibit 726 marked and admitted Letter to John Baiocco from Steve Chamberlain, dated April 8, 2010 regarding verification of specific invoices payable to permit completion of quarterly review	
1096			X	X	Exhibit 1096 marked and admitted Email from SalazarJ to ScottJ attaching 2010-09-30 – Capax Purchase Order (EU – Amazon) [executed].pdf	
1125			X	X	Exhibit 1125 marked and admitted Email from John Baiocco to Stouffer Egan attaching amended Capax Discovery invoice for \$450,000 re EAS Support Plan	
17024			X	X	Exhibit 17024 marked and admitted Email from BaioccoJ to Chamberlain re "FSA"	
1232			X	X	Exhibit 1232 marked and admitted Email from John Baiocco to Glenn Fong re payment terms and commissions with Autonomy	
17025			X	X	Exhibit 17025 marked and admitted Email from BaioccoJ to ChaberlainS re "RE: [SPAM] FSAL"	
1250			X	X	Exhibit 1250 marked and admitted Email from John Baiocco to Helen Ku re Capax Payment Status	
1374			X	X	Exhibit 1374 marked and admitted Fax of purchase order from Capax for the US Department of the Army	
1451			X	X	Exhibit 1451 marked and admitted Email from BaioccoJ to ChamberlainS re "RE: [SPAM] FSA update"	
1487			X	X	Exhibit 1487 marked and admitted Email from Stouffer Egan to John Baiocco explaining replacement of Amgen deal with BofA purchase	
1096			X	X	Exhibit 1096 previously admitted	
1580			X	X	Exhibit 1580 marked and admitted Email from Steve Truitt to John Baiocco attaching purchase order for BOA deal	
1563			X	X	Exhibit 1563 marked and admitted Email from BaioccoJ to ChamberlainS re "RE: [SPAM] FSA"	
1605			X	X	Exhibit 1605 marked and admitted Email from Jorge Salazar to John Baiocco attaching letter agreement canceling Amgen p.o. and replacing with BOA	
1634			X	X	Exhibit 1634 marked and admitted Email from Dave Spadone to Stephen Chamberlain attaching \$945k invoice for Amgen/BofA deal	
1657			X	X	Exhibit 1657 marked and admitted Email from BaioccoJ to ChamberlainS re "RE: [SPAM] FSA"	
1686			X	X	Exhibit 1686 marked and admitted E-mail from Joel Scott to John Baiocco, dated March 31, 2011, regarding "Capax PO Drafts"	
1691			X	X	Exhibit 1691 marked and admitted Purchase Order between Autonomy, Inc. and Capax Discovery, LLC, dated March 31 2011	
17144			X	X	Exhibit 17144 marked and admitted	
17145			X	X	Exhibit 17145 marked and admitted	

1731			X	X	Exhibit 1731 marked and admitted Letter to John Baiocco from Steve Chamberlain dated April 6, 2011 regarding verification of specific invoices payable to permit the completion of annual audit	
1739			X	X	Exhibit 1739 marked and admitted Email from Baiocco e-mail to Lucini re "Re: Cambridge"	
1750			X	X	Exhibit 1750 marked and admitted Email from Baiocco to Hussain re "Fwd: second amendment to license"	
1907			X	X	Exhibit 1907 marked and admitted Email from John Baiocco attaching draft purchase order for UBS deal from Joel Scott email	
1962			X	X	Exhibit 1962 marked and admitted Email from John Baiocco to Joel Scott attaching corrected purchase order for Capax/UBS	
2216			X	X	Exhibit 2216 marked and admitted Commercial Software License Agreement entered into between Autonomy and Capax Global LLC	
2347			X	X	Exhibit 2347 marked and admitted Marketing Assistance Fee Agreement letter entered into between Autonomy and Capax Discovery	
2354			X	X	Exhibit 2354 marked and admitted Email from Joel Scott to John Baiocco attaching three draft Marketing Assistant Fee agreement letters	
2363			X	X	Exhibit 2363 marked and admitted Revised Payment Arrangement between Autonomy and Capax Discovery LLC for \$4.5m	
		12:12 p.m.			Court in recess	
		1:23 p.m.			Court reconvened. Court Reporter – Rhonda Aquilina All jurors present. All parties present. Government direct-examination of witness John Baiocco	
2237			X	X	Exhibit 2237 marked and admitted Email from John Baiocco to Dave Spadone and Charlie Chiampou attaching invoices and aging report related to settlement of credit notes for UBS deal	
		1:33 p.m.			Defense (Lynch) cross-examination of witness John Baiocco	
	428		X		Exhibit 428 previously admitted	
	7319		X	X	Exhibit 7319 marked and admitted Email from BaioccoJ to SassR, re: "RE: Capax EDD Software"	
	7322		X	X	Exhibit 7322 Email from SassR to BaioccoJ, re: "RE: Autonomy proposal"	
	7320		X	X	Exhibit 7320 marked and admitted	
	32		X		Exhibit 32 previously admitted	
	5518		X	X	Exhibit 5518 marked and admitted Email from CoxB to RimmerT FW: Capax Sales literature	
		2:25 p.m.			Court in recess	
		2:41 p.m.			Court reconvened. All jurors present. All parties present. Defense (Lynch) cross-examination of witness John Baiocco	

	7304		X	X	Exhibit 7304 marked and admitted Email from SassR to BaioccoJ, re: "RE: End of Q2 deals"	
	100		X		Exhibit 100 previously admitted	
	231		X	X	Exhibit 231 marked and admitted First Amendment to Autonomy, Inc. Value Added Reseller Agreement entered into between Autonomy, Capax Discovery LLC and three other Capax entities. Signed by Andrew Kanter and John Baiocco	
	1630		X	X	Exhibit 1630 marked and admitted Fifth Amendment to Autonomy, Inc. Value Added Reseller Agreement entered into between Autonomy and several Capax entities	
	5407		X	X	Exhibit 5407 marked and admitted Email from J. Baiocco to KanterA RE: Autonomy Project Hours	
	2216		X		Exhibit 2216 previously admitted	
		3:19 p.m.			Defense (Chamberlain) cross-examination of witness John Baiocco	
	2559		X		Exhibit 2559 previously admitted	
	1445		X	X	Exhibit 1445 marked and admitted Letter to John Baiocco from Steve Chamberlain dated January 14, 2011 regarding verification of specific invoices payable to permit the completion of annual audit	
	949		X	X	Exhibit 949 marked and admitted Email from BaioccoJ to MurrayT re "Autonomy Debtor Confirmation request" (capax audit confirm)	
	2758		X	X	Exhibit 2758 marked and admitted Email from EganS to BaioccoJ, cc to SullivanM re "RE: Update"	
	20004.16		X		Exhibit 20004.16 marked	
	16652		X	X	Exhibit 16652 marked and admitted Email from BaioccoJ to HussainS FW: Autonomy Invoices	
	9800		X	X	Exhibit 9800 marked and admitted Email from J. Baiocco to R. Sass re: RE: can u call me?	
	16652		X		Exhibit 16652 previously admitted	
	9674		X	X	Exhibit 9674 marked and admitted Email from J. Baiocco to R. Sass re: FW: Autonomy invoices	
	9675		X	X	Exhibit 9675 marked and admitted Email from J. Baiocco to S. Egan re: RE: Message	
	9676		X	X	Exhibit 9676 marked and admitted Email from J. Baiocco to S. Egan re: Fw: [SPAM]	
	20004.19		X		Exhibit 20004.19 marked	
	9677		X	X	Exhibit 9677 marked and admitted	
	9678		X	X	Exhibit 9678 marked and admitted	
	9679		X	X	Exhibit 9679 marked and admitted	
		3:57 p.m.			The Court addressed the jurors. On April 22 nd court will end at 1:00 p.m. On April 25, 2025 is dark.	

		4:00 p.m.			Court instructs the jurors. Jurors excused until 3/25.	
		4:05 p.m.			Court adjourned until March 25, 2024 at 9:15 a.m.	